State of California
Department of Fish and Game



## Memorandum

Date: May 30, 2008

To:

Susan Fergien

Regional Water Quality Control Board,

Central Valley Region

11020 Sun Center Drive, Suite 200 Rancho Cordova, CA 95670-6114

From:

Carl Wilcox, Chie

Water Branch

Department of Fish and Game

Subject: Development of a Long-Term Irrigated Lands Regulatory Program and a

Programmatic Environmental Impact Report

The Department of Fish and Game (DFG) appreciates the opportunity to provide comments regarding development of a Long-Term Irrigated Lands Regulatory Program (ILRP) and a Programmatic Environmental Impact Report.

The Central Valley Regional Water Quality Control Board's March 19, 2008 scoping document provides proposed scope and goals for the Long-Term ILRP, including potential changes which may affect managed wetlands. DFG has participated in initial discussions with ILRP staff and wetland managers in both the public and private sectors to discuss the impact of these potential changes, and believes there are many unknowns at this point in the scoping process regarding managed wetlands. DFG agrees the "one size fits all" approach provides program efficiency, yet does not recognize the unique background, setting, and public trust contribution of managed wetlands.

At this time we do not suggest DFG managed wetlands "opt out" of the current Irrigated Land Regulatory Program. We suggest continued discussions with Board staff and other wetland managers to better understand how any proposed program changes will impact managed wetlands and the public trust benefits they provide.

We look forward to working with you on the Long-Term ILRP. If you have any questions, please contact Chad Dibble at (916) 445-1202, or Paul Forsberg at (916) 323-7215.

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